

Bruce A. Connell
Senior Counsel
EP Americas - Legal

REC'D TN
REGULATORY AUTH.

OCT 19 1999 AM 10 36

OFFICE OF THE
EXECUTIVE SECRETARY

Conoco Inc.
600 N. Dairy Ashford (77079) ML 1034
P.O. Box 4783
Houston, TX 77210
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Email: bruce.a.connell@usa.conoco.com

October 11, 1999

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ADMINISTRATIVE

OCT 19 1999

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37246-0505

TN REGULATORY AUTHORITY

JR

Re: Application of Chattanooga Gas Company to Abandon Service to
E. I. DuPont's de Nemours Company
Docket No. 99-00693

Dear Mr. Waddell:

Enclosed please find a check in the amount of \$25.00 that was inadvertently omitted from the Intervention. Also, please send a copy of the procedural rules so that we can avoid any future errors.

Thank you for your assistance.

Yours very truly,

Bruce A. Connell
by Charlotte

cks

Enc.

cc: All Parties

CK# 3739
\$25.00

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Bruce A. Connell
Senior Counsel
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REGULATORY
OCT 11 AM 8:51
Conoco Inc.
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Tel.: (281) 293-1736
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OFFICE OF THE
EXECUTIVE SECRETARY

October 5, 1999

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37246-0505

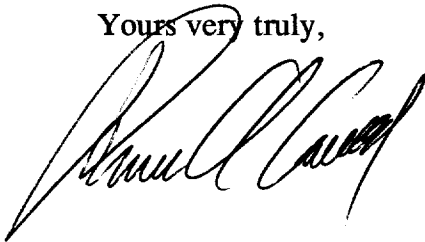
**Re: *Application of Chattanooga Gas Company to Abandon Service to E. I.
DuPont's de Nemours Company
Docket Number 99-00693***

Dear Mr. Waddell:

Enclosed please find one original and fifteen copies of the Motion of Conoco Inc. for Leave to Intervene in the above-referenced proceeding.

Please stamp and return the extra copy of this submission in the enclosed envelope.

Yours very truly,



cks
Enc.
cc: All Parties

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE:
APPLICATION TO ABANDON SERVICE
TO E.I. DuPONT de NEMOURS COMPANY
AND TO OFFER FUTURE SERVICE UPON
NEGOTIATED, NON, REGULATED PRICES**

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§
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DOCKET NO. 99-00693

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REGULATORY AUTH
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EXECUTIVE SECRETARY

**PETITION OF CONOCO INC.
FOR LEAVE TO INTERVENE**

Pursuant to T.C.A. 4-5-310, Conoco Inc. ("Conoco") hereby respectfully petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding. In support of this motion, Conoco states as follows:

I.

The exact legal name of movant is Conoco Inc. Conoco is a Delaware corporation with its executive offices located at 600 North Dairy Ashford, Houston, Texas 77079. Conoco is an independent producer and seller of natural gas.

II.

The names and mailing addresses of the persons upon whom all communications concerning the proceeding should be served are as follows:

Bruce A. Connell
Legal Department
Conoco Inc.
600 N. Dairy Ashford, ML-1034
Houston, Texas 77079
(281) 293-1736

and

H. Allan Knopp
Director, Regulatory Affairs
Natural Gas and Gas Products
Conoco Inc.
P.O. Box 2197, CH-1038
Houston, Texas 77252
(281) 293-3753

FILE

III.

On September 16, 1999, Chattanooga Gas Company petitioned the Authority for approval to abandon all jurisdictional natural gas sales and transportation services to E. I. DuPont de Nemours Company ("DuPont") in the jurisdictional area of Chattanooga Gas Company pursuant to T.C.A. § 65-4-114(2) and to authorize any future natural gas sales or transportation services that may be requested by DuPont from Chattanooga to be upon a negotiated, non-regulated price and other terms of service.

IV.

Conoco is contractually responsible to supply gas to DuPont's Chattanooga Plant. In such circumstances, Conoco respectfully submits that it has direct and substantial interests in this proceeding and that its interests cannot adequately be represented by any other party.

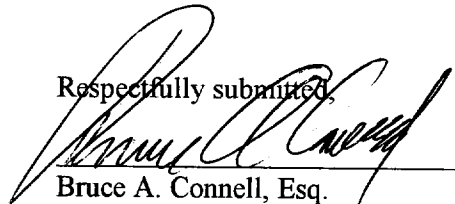
V.

The undersigned, an attorney in good standing before the State Bar of Texas, respectfully requests that he be any necessary granted a waiver and that he be admitted to practice before the Commission to represent the interests of Conoco Inc. herein.

VI.

WHEREFORE, Conoco respectfully requests that it be permitted to intervene in this proceeding and to pursue its interests as set forth herein and as may arise during the course of this proceeding. Conoco further requests that it be granted all the rights of a party, including the right to participate fully in all formal and informal conferences and hearings, to receive copies of all pleadings and evidence, to present evidence, cross examine witnesses, submit arguments and briefs and to engage in any other act or acts permitted any other party to this proceeding.

Respectfully submitted,



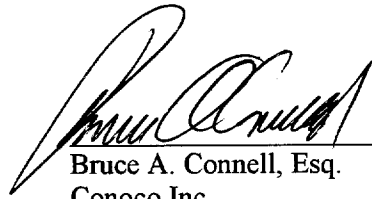
Bruce A. Connell, Esq.
Attorney for Conoco Inc.
Texas State Bar No. 04678715
600 N. Dairy Ashford, ML-1034
Houston, Texas 77079
(281) 293-1736

October 5 1999

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the Tennessee Regulatory Authority, and all parties on the service list.

Dated at Houston, Texas this 5th day of October, 1999.



Bruce A. Connell, Esq.
Conoco Inc.
600 N. Dairy Ashford, ML-1034
Houston, Texas 77079
(281) 293-1736

SERVICE LIST

Mr. Hal Novak
Atlanta Gas Light Company
P.O. Box 4569
Atlanta, Georgia 30302

Mr. Earl Burton
Chattanooga Gas Company
6125 Preservation Drive
Chattanooga, Tennessee 37416

Mr. Vincent Williams
Consumer Advocated Division
Office of the Attorney General
450 James Robertson Parkway
Nashville, Tennessee 37243-0485

Mr. Jerry Violete
Plant Manager, Chattanooga Plant
E. I DuPont de Nemours Company
4501 Access Road
Chattanooga, Tennessee 37415